

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

vs.

NO. 2:13-CR-270(6)
JUDGE FROST

WAYNE C. COFFMAN

GOVERNMENT'S PLEA AGREEMENT SUBMISSION
OF ELEMENTS AND PENALTIES
FOR 21 U.S.C. §§841(a)(1), 841(b)(1)(C), 841(b)(1)(D) and 846;

1. ELEMENTS: 21 U.S.C. §§841(a)(1), 841(b)(1)(C), 841(b)(1)(D) and 846
(COUNT 1 – STIPULATED LESSOR INCLUDED OFFENSE)

- First: The defendant agreed with at least one other person, to distribute and possess with intent to distribute Oxycodone and marijuana;
- Second: The conspiracy described in the Indictment was willfully formed, and existed at or about the time alleged;
- Third: The defendant willfully became a member of the conspiracy;
- Fourth: The objectives of the conspiracy was to distribute and possess with intent to distribute Oxycodone and marijuana; and
- Fifth: That said agreement existed, at or about the time alleged, in the Eastern Division of the Southern District of Ohio

2. PENALTIES

- A. Mandatory Minimum: None.
- B. Possible Maximum: 0-20 years in prison, a fine of \$1,000,000, a term of supervised release of at least three years, and \$100 special assessment

Respectfully submitted,

CARTER M. STEWART
United States Attorney

s/David M. Devillers

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